

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

**CASE NO. 1:19-CV-593**

ZION WILLIAMSON,

Plaintiff,

v.

PRIME SPORTS MARKETING, LLC, and  
GINA FORD,

Defendants.

**PLAINTIFF'S MOTION TO  
AMEND COMPLAINT (WITH  
CONSENT)**

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure and Local Rule 15.1 of the Rules of Practice and Procedure of the United States District Court for the Middle District of North Carolina, Plaintiff Zion Williamson, by and through his undersigned counsel, moves the Court for leave to amend his Complaint in the above-captioned action by filing a First Amended Complaint. Defendants Prime Sports Marketing, LLC and Gina Ford (“Defendants”) consent to this Motion. In support of this Motion, Williamson shows the Court as follows:

1. Williamson filed his complaint against Defendants on Thursday, June 13, 2019 (the “Original Complaint”).
2. On Wednesday, July 3, 2019, Williamson and Defendants filed a Joint Stipulation for Extension of Time for Defendants to answer the Original Complaint (the “Joint Stipulation”).

3. The Court granted the Joint Stipulation in a text order dated Thursday, July 11, 2019, allowing Defendants through Monday, September 16, 2019 to answer the Complaint.

4. Defendants have not yet answered the Original Complaint.

5. Federal Rule of Civil Procedure 15(a)(2) provides that “a party may amend its pleading . . . with the opposing party’s written consent or the court’s leave.” The Rule goes on to provide that the “court should freely give leave when justice so requires.”

6. Here, Defendants have provided their written consent to Williamson’s filing of the First Amended Complaint. Moreover, Defendants have not yet answered the Original Complaint, and Defendants’ time to do so is still more than three weeks away. The filing of the First Amended Complaint thus will not delay proceedings in this case in any way. Williamson’s First Amended Complaint is also made in good faith and is not futile. *See Cravey v. Univ. of N.C. at Chapel Hill*, No. 1:17CV1014, 2018 WL 4471732, at \*2 (M.D.N.C. Sept. 18, 2018) (Biggs, J.) (granting leave to amend).

7. A copy of the First Amended Complaint is attached as Exhibit 1 to this Motion.

WHEREFORE, Williamson respectfully requests leave to amend his Complaint in this matter as set forth in the First Amended Complaint attached as Exhibit 1.

*[Signatures Follow]*

Dated: August 21, 2019

/s/ John R. Wester

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\*Local Rule 83.1(d) Special Appearance  
filed.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2019, I electronically filed the foregoing **PLAINTIFF'S MOTION TO AMEND COMPLAINT (WITH CONSENT)** with the Clerk of the Court using the CM/ECF system, which will electronically serve the following:

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